

## **CC Docket No. 94-102 – January 2004 E911 Interim Report**

**Filed by:** Commnet Four Corners, L.L.C.

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**Date:** January 15, 2004

**To:** Marlene H. Dortch, Secretary  
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### **By Electronic Submission:**

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**TIER III CARRIER INTERIM REPORT  
AS OF JANUARY, 2004  
CC Docket No. 94-102**

Commnet Four Corners, L.L.C. ("CFC") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), *Public Notice*, DA 03-2113, released June 30, 2003, and *Order to Stay*, FCC 03-241, released October 10, 2003.

**Carrier Identifying Information:**

**Carrier Name:** Commnet Four Corners, L.L.C. – FRN 0009-5728-84

**E911 Compliance Officer:** John D. Champagne  
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**E911 Implementation Information:**

CFC is a wholly-owned subsidiary of Commnet Wireless, LLC ("CWLLC") (formerly Commnet Capital, LLC). On September 11, 2003, CWLLC assigned its PCS licenses in the Four Corners region to CFC. CFC is a "Tier III" wireless carrier, as defined in the Commission's decision in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, 17 FCC Red. 14841 (2002) ("*Small Carrier E911 Extension*"). CFC commenced operations in September 2003, and is operating as a "carriers' carrier". Thus, CFC has no subscribers and will not have any subscribers. Based on this premise, CFC hereby reports as follows:

- ☐ CFC has not received any Phase I or Phase II requests from PSAPs. CFC has obtained and installed all of the equipment and software necessary to meet any Phase I request from a PSAP. Additionally, CFC has retained the services of Intrado, Inc., as a consultant to assist it in contacting and working with any PSAP in its market that may request Phase I E911. Intrado is one of the most respected names in the E911 industry. Most of its personnel have over twenty years of experience working for PSAPs or in the PSAP field.

CFC is dependent on a landline between the switch and any requesting PSAP for Phase I deployment, and will have to work with the local exchange carrier ("LEC") to have a landline installed when the time comes. CFC's system operates in remote, rural areas, and it can take a LEC as long as 12 or even 18 months to install a new landline in a rural area. Thus, there is the substantial possibility that a PSAP's request would remain outstanding longer than six months while CFC awaits the installation of a landline connection to the PSAP. Notably, because CFC has no subscribers, CFC does not have the means to fund any Phase I implementation and recurring costs via pass-throughs to subscribers.

- CFC elected a handset-based solution. Specifically, CFC is using analog and TDMA technology, and is considering migration to GSM technology.
- CFC has installed all of the necessary switch hardware and software for Phase I E911 deployment. CFC anticipates a significant problem with its Phase II E911 deployment. There is currently no Phase II-compliant handset-based solution available for either TDMA or GSM, and it appears that one will not become available any time in the near future. Moreover, CFC is unable to switch to a network-based solution, because it is technically impossible. The only Phase II-compliant network-based solutions available are based on either triangulation techniques, which can work only when the network is receiving location information on the involved mobile unit from three different cell sites, or angle of arrival techniques (“AOA”), which can work only when the network is receiving location information from at least two different cell sites.

CFC operates only in remote, rural areas where population density is low and the cell sites are spread far apart. There is little overlap between two cells and no overlap among three cells. Thus, only a small portion of CFC’s service area is susceptible to either triangulation or AOA techniques; the bulk of the service area is not susceptible to such techniques. Therefore, even if CFC were to implement Phase II E911, it would never be able to reach the required 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission’s rules.

- CFC does not anticipate that full Phase II service will ever be available in its network, for the reasons discussed above pertaining to the permanent absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond CFC’s control. Even if CFC were to migrate to GSM technology, there is currently no GSM handset-based technology available, and vendor predictions of future development are unreliable. CFC has a request pending with the Commission for a permanent waiver of the Phase II requirements.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.